



Hoffman Employment Law, LLC

600 Jefferson Plaza Suite 204
Rockville, MD 20852
Phone: 301-251-3752 | Fax: 301-251-3753

Account Statement

Prepared for Amber Carney
Re: Sunset Grille FLSA Litigation

Previous Balance	\$0.00
Current Charges	\$49,232.75
New Balance	\$49,232.75
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$49,232.75
Trust Account	\$0.00

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PRE-BILL

Amber Carney
1026 Leeward Place
Unit B-1
Melbourne, FLA 32935
United States of America

Invoice Date: May 10, 2019
Invoice Number: Pre-bill
Invoice Amount: \$49,232.75

Matter: Sunset Grille FLSA Litigation

Attorney's Fees

12/7/2017	Tele conf. with A. Carney re potential claims. (1.6 hrs).	H.B.H.	1.60	\$640.00
12/11/2017	Tele conf. with AC re status of matter.	H.B.H.	.30	\$120.00
1/16/2018	Draft opt-in notice.	H.B.H.	.10	\$40.00
3/26/2018	Tele conf. with client re facts of claim and review of Complaint.	H.B.H.	1.10	\$440.00
3/26/2018	Review file materials. Draft Collective Action Complaint. Review and revise. Draft proposed Summons and civil cover sheet. Open case via ECF.	H.B.H.	7.10	\$2,840.00
3/27/2018	Review issuance of Summons.	H.B.H.	.10	\$40.00
4/30/2018	Tele conf. with client re status of matter. (.3 hrs). Draft memo to Beach Process Service; prepare materials and transmit to Beach Process via Priority Mail. (.3 hrs).	H.B.H.	.60	\$240.00
5/21/2018	Tele conf. with opposing counsel re extension of response date and service of process. (.1 hrs). Review file materials re Proof of Service. File same via ECF. (.2 hrs).	H.B.H.	.30	\$120.00
5/21/2018	Briefly review proposed Motion for Extension of Time.	H.B.H.	.10	\$40.00
5/22/2018	Review Notices of Appearances and Motion for Extension of Time.	H.B.H.	.10	\$40.00
5/22/2018	Review proposed Motion to Extend; review and respond to J Tong's email attaching draft Motion to Extend.	H.B.H.	.20	\$80.00
5/27/2018	Review and respond to comm. from client re status	H.B.H.	.20	\$80.00

	of matter.			
6/10/2018	Tele conf. with A. Carney re status of matter.	H.B.H.	.50	\$200.00
6/28/2018	Draft notice of appearance	J.L.	.10	\$20.50
6/28/2018	Editing entry of appearance	J.L.	.10	\$20.50
6/28/2018	Finalizing and filing notice of appearance	J.L.	.20	\$41.00
6/29/2018	Reviewed prior Sunset case materials and drafted motion for conditional certification	J.L.	5.70	\$1,168.50
7/6/2018	Discuss w/ HBH re case status and strat	J.L.	.10	\$20.50
7/12/2018	Review and input sched. ord. into calendar	J.L.	.20	\$41.00
7/12/2018	Review email corres. between HBH and opp con. re FLSA coverage issue	J.L.	.10	\$20.50
7/12/2018	Comm. with opposing counsel re status of scheduling order. Review Answer and draft Joint Stipulation re Enterprise Coverage; forward to opposing counsel.	H.B.H.	1.30	\$520.00
7/12/2018	Briefly review scheduling order.	H.B.H.	.20	\$80.00
7/12/2018	Begin revising Motion for Cond Cert.	H.B.H.	.50	\$200.00
7/13/2018	Review and respond to comm. from J. Tong re stipulation.	H.B.H.	.10	\$40.00
7/16/2018	Draft Request for Admissions; review and revise. Transmit.	H.B.H.	.90	\$360.00
7/16/2018	Tele conf. with client re status of matter and facts in support of Cond Cert. (.7 hrs). Draft Declaration. Review and revise. Draft comm. to client attaching same. (.8 hrs)	H.B.H.	1.50	\$600.00
7/16/2018	Review comm. from J. Tong re enterprise coverage issue; draft response.	H.B.H.	.10	\$40.00
7/16/2018	Review comm. from D. English re enterprise coverage.	H.B.H.	.10	\$40.00
7/18/2018	Phone confer with op con re scheduling order, class notice, class definition, prelim disc.	J.L.	.30	\$61.50
7/18/2018	Confer w/ HBH re next steps, division of labor re class notice and class def to op con.	J.L.	.20	\$41.00
7/18/2018	Edit and draft email to op con re class definition, class notice.	J.L.	.20	\$41.00
7/18/2018	Draft definition for class	J.L.	.40	\$82.00
7/18/2018	Edit email to op con re cond. cert. not. and class def. w/ HBH	J.L.	.20	\$41.00
7/18/2018	Review class notice, finalize email to op con re consented cond. cert. and class def.	J.L.	.40	\$82.00
7/18/2018	Tele conf. with D. English and J. Tong re scheduling and conditional certification. (.3 hrs). Draft class notice. (.2 hrs). Multi confer with J. Liew re proposals to consent motion. (.5 hrs).	H.B.H.	1.30	\$520.00
7/18/2018	Tele conf. with client re status of matter and Declaration revisions. (.3 hrs). Revise Declaration and forward via docusign.	H.B.H.	.40	\$160.00
7/20/2018	Review response to D. English re Cond Cert; draft response thereto. Review reply.	H.B.H.	.20	\$80.00
7/26/2018	Phone convo. w/ HBH re mot. to extend and cond. cert. strat.	J.L.	.30	\$61.50

7/26/2018	Draft and file consent mot. to extend due to HBH emergency	J.L.	1.10	\$225.50
8/1/2018	Review and draft lengthy response to outstanding issues re conditional cert.	H.B.H.	.80	\$320.00
8/2/2018	Draft joint initial report	J.L.	1.80	\$369.00
8/2/2018	Edit and file joint initial report	J.L.	.30	\$61.50
8/2/2018	Review and respond to comm. from J. Tong re status report.	H.B.H.	.10	\$40.00
8/2/2018	Review proposed joint status report prepared by J Liew; propose revisions to same. Review revisions by Defendants.	H.B.H.	.20	\$80.00
8/2/2018	Review filed status report.	H.B.H.	.10	\$40.00
8/2/2018	Review Notice of Appearance Charles Kresslein.	H.B.H.	.10	\$40.00
8/7/2018	Review case status w/ HBH and GH	J.L.	.10	\$20.50
8/7/2018	Draft mot. for cond. cert	J.L.	2.60	\$533.00
8/7/2018	Conference on case	G.H.	.10	\$20.50
8/7/2018	Review Opposition to Motion for Leave to File 1st Amended Complaint; confer with J. Liew and J, Rubin re same. Review legal research.	H.B.H.	.70	\$280.00
8/8/2018	Draft unopposed mot. cond. cert. and edit opt-in notice	J.L.	6.20	\$1,271.00
8/8/2018	Confer with associates and J. Rubin re discovery issues; confer re deposition dates, draft comm to Pham. Discuss strategies and division of labor re depositions.	H.B.H.	.80	\$320.00
8/8/2018	Review and revise draft subpoena to accountants. Confer with associates re same,	H.B.H.	.50	\$200.00
8/9/2018	Review response to Request for Admissions; draft reply.	H.B.H.	.10	\$40.00
8/14/2018	Draft proposed order for unopposed mot. for cond. cert.	J.L.	.30	\$61.50
8/14/2018	Edit notice for unopposed mot. for cond. cert.	J.L.	.10	\$20.50
8/15/2018	Review edits to unopposed motion for cond. cert, draft prop order.	J.L.	1.00	\$205.00
8/15/2018	Update proposed order for unopposed mot. for cond. cert.	J.L.	.10	\$20.50
8/15/2018	Review edits to prop order for unop. mot for cond. cert.	J.L.	.20	\$41.00
8/16/2018	Review comm. from counsel re status of matter (proposed edits to unopposed motion).	H.B.H.	.10	\$40.00
8/17/2018	Prepare unopposed mot. for cond. cert. for filing, file motion.	J.L.	.80	\$164.00
8/17/2018	Draft comm. to opposing counsel re Motion for Cond Cert. (.1 hr) Review response from CK re edits. (.1 hrs). Review proposed filing and multi conf with J. Liew re filing of same. (.3 hrs).	H.B.H.	.50	\$200.00
8/24/2018	Review Order of Court granting conditional certification.	H.B.H.	.10	\$40.00
8/30/2018	Discuss case status with HBH and GH.	J.L.	.10	\$20.50
8/30/2018	conf with HBH and JL regarding status and assignments	G.H.	.10	\$20.50

8/31/2018	review email to opposing counsel regarding class notice	G.H.	.10	\$20.50
8/31/2018	Review comm. from opposing counsel with class list; draft comm. to Kris Foster (Judicial Assistant) re Class Action Notice.	H.B.H.	.30	\$120.00
9/4/2018	Creating mailing labels.	J.L.	1.40	\$287.00
9/5/2018	Create mailing labels for opt-in notices.	J.L.	4.80	\$984.00
9/5/2018	Review Class Notice, signed by Court.	H.B.H.	.10	\$40.00
9/7/2018	Review and print address labels for opt-in and class notice mailings	J.L.	3.00	\$615.00
9/7/2018	Prepare class and opt-in notices and envelope for mailing.	J.L.	4.30	\$881.50
9/7/2018	prepare opt-in notice mailing for potential opt-in plaintiffs	G.H.	1.40	\$287.00
9/7/2018	Obtain postage. (.5 hrs, Gratis). Prepare class notice; multi comm. with J. Liew and G. Herbers re class mailing. Assist with preparation of documents re class mailing.	H.B.H.	3.90	\$1,560.00
9/10/2018	Preparing and stuffing class and opt-in notices.	J.L.	.40	\$82.00
9/10/2018	Prepare mailing of class notification and opt-in notice	G.H.	.80	\$164.00
9/10/2018	Prepare and stuff class and opt-in notices into envelopes for mailing.	J.L.	.50	\$102.50
9/10/2018	Print, organize, and stuff Class notification and opt in notices for proposed class.	G.H.	.50	\$102.50
9/10/2018	Preparing and stuffing class and opt in notices for mailing.	J.L.	.90	\$184.50
9/10/2018	print, organize, and stuff class notices and opt in notices for potential opt in plaintiffs	G.H.	.90	\$184.50
9/10/2018	Confer. w/ HBH and GH re case status and assignment of duties.	J.L.	.10	\$20.50
9/10/2018	conf with HBH and JL regarding case status and assignments	G.H.	.10	\$20.50
9/12/2018	Draft email to op con re. mailer status and address questions.	J.L.	.20	\$41.00
9/12/2018	Review email from JL regarding mismatched addresses for class notification.	G.H.	.10	\$20.50
9/12/2018	Confer with J. Liew re correspondence to Defendants.	H.B.H.	.10	\$40.00
9/13/2018	Tele conf. with A. Carney re status of matter.	H.B.H.	.50	\$200.00
9/13/2018	Phone call w/ opt-in Pl. introduction and contact info check.	J.L.	.10	\$20.50
9/13/2018	Prepare, redact Pl. opt-in notice for filing. File notice. Create file.	J.L.	.50	\$102.50
9/13/2018	Review opt-in consent notice; confer with J. Liew re same. Review filing of same.	H.B.H.	.10	\$40.00
9/18/2018	Call opt-in Pl., file opt-in, create file.	J.L.	.50	\$102.50
9/18/2018	Review opt-in notice filing.	H.B.H.	.10	\$40.00
9/25/2018	Phone call to opt-in Pl.	J.L.	.10	\$20.50
9/26/2018	Catalog returned opt-in notices.	G.H.	.80	\$164.00
9/26/2018	Draft email to op con following up on email re	J.L.	.10	\$20.50

	mistaken addresses for pot. opt-ins.			
9/26/2018	Draft email to opposing counsel regarding cell numbers of undeliverable opt in notices.	G.H.	.10	\$20.50
9/26/2018	Review email with opposing counsel regarding class members' contact information.	G.H.	.10	\$20.50
9/26/2018	Confer with G. Herbers re undeliverable class notices.	H.B.H.	.20	\$80.00
9/27/2018	Phone call w/ opt-in Pl.	J.L.	.10	\$20.50
9/27/2018	Prepare and file opt-in notice for Pl.	J.L.	.20	\$41.00
9/27/2018	Update contact list, create personnel file, email Pl. filed opt-in notice.	J.L.	.10	\$20.50
9/27/2018	Review opt-in filing re Gavin Arthur and review comm. from J. Liew to Gavin Arthur re same.	H.B.H.	.10	\$40.00
9/28/2018	Review comm re J Tong re payroll for Z. Brooks.	H.B.H.	.10	\$40.00
10/1/2018	Review email from opposing counsel regarding undeliverable mail.	G.H.	.10	\$20.50
10/1/2018	Review phone listing re undeliverable mailings.	H.B.H.	.10	\$40.00
10/4/2018	Review email from JSL regarding potential opt-in addresses.	G.H.	.10	\$20.50
10/4/2018	Review and reply to email from op con. re updated addresses for pot. opt-ins.	J.L.	.10	\$20.50
10/4/2018	Review email exchange with opposing counsel regarding addresses for potential opt-ins.	G.H.	.10	\$20.50
10/4/2018	Conf. with HBH and JSL regarding case status and conversations with opposing counsel.	G.H.	.10	\$20.50
10/4/2018	Confer w/ HBH and GBH re case status and op con. details.	J.L.	.10	\$20.50
10/4/2018	Review comm. b/w counsel re updated addresses.	H.B.H.	.10	\$40.00
10/8/2018	Prepare, print, and stuff additional set of opt-in mailers.	J.L.	.60	\$123.00
10/8/2018	Prepare additional opt-in mailers.	J.L.	.30	\$61.50
10/10/2018	Phone call w/ pot. opt-in w/ questions.	J.L.	.20	\$41.00
10/10/2018	Conf. with HBH regarding text notice to potential opt-in plaintiffs.	G.H.	.10	\$20.50
10/10/2018	Draft text notice for potential opt-in plaintiff.s	G.H.	.30	\$61.50
10/10/2018	View and discuss text message options for opt-in notice via text message.	J.L.	.20	\$41.00
10/11/2018	Conf. with HBH and JSL regarding case status and assignments.	G.H.	.10	\$20.50
10/11/2018	Discuss case status w/ HBH and GBH.	J.L.	.10	\$20.50
10/24/2018	Compile undelivered opt-in notices and draft email to opposing counsel requesting cell phone records.	G.H.	.40	\$82.00
10/24/2018	Discuss case status w/ HBH and GBH.	J.L.	.10	\$20.50
10/24/2018	Conf with HBH and JSL regarding case status and future assignments.	G.H.	.10	\$20.50
10/26/2018	Draft email to opposing counsel regarding undeliverable opt-in mailings.	G.H.	.10	\$20.50
10/29/2018	Review email from opposing counsel regarding cell numbers for undeliverable potential opt-in clients.	G.H.	.10	\$20.50
11/8/2018	Review email from HBH to op con re end of opt-in period.	J.L.	.10	\$20.50

11/8/2018	Draft comm to opposing counsel re status of matter, including late opt-in.	H.B.H.	.10	\$40.00
11/9/2018	Review email from HBH to opposing counsel regarding end of opt-in period and scheduling.	G.H.	.10	\$20.50
11/9/2018	Review email from op con re consent to late opt-in and scheduling a call.	J.L.	.10	\$20.50
11/9/2018	Review comm. from D. English re late opt-in.	H.B.H.	.10	\$40.00
11/13/2018	Draft mot. to late file Riffey opt-in, scan and redact Riffey opt-in for filing, create Riffey file.	J.L.	1.10	\$225.50
11/14/2018	Update client list.	J.L.	.10	\$20.50
11/14/2018	Review Order granting leave to file late filed opt-in.	H.B.H.	.10	\$40.00
11/15/2018	Review email from opposing counsel regarding scheduling a phone call to discuss scheduling.	G.H.	.10	\$20.50
11/15/2018	Draft comm to D. English re status of matter.	H.B.H.	.10	\$40.00
11/16/2018	Review email exchange between HBH and opposing counsel regarding scheduling phone call to discuss how to proceed with the case.	G.H.	.10	\$20.50
11/16/2018	Review and respond to comm from D. English.	H.B.H.	.10	\$40.00
11/19/2018	Review email from opposing counsel regarding scheduling a call to determine discovery schedule.	G.H.	.10	\$20.50
11/19/2018	Review email corresp. w/ op con re how to proceed forward in case.	J.L.	.10	\$20.50
11/19/2018	Review email from opposing counsel regarding phone call and fees.	G.H.	.10	\$20.50
11/20/2018	Sort and organize prebill spreadsheet.	J.L.	.30	\$61.50
11/20/2018	Draft lodestar letter.	J.L.	.20	\$41.00
11/20/2018	Phone call w/ pot. opt-in.	J.L.	.20	\$41.00
11/20/2018	Sort revised prebill spreadsheet, update lodestar letter.	J.L.	.20	\$41.00
11/20/2018	Review def prod. disc., identify missing files, draft email to op con re. missing files.	J.L.	.30	\$61.50
11/20/2018	Review email from JSL to opposing counsel regarding missing documents for opt-ins	G.H.	.10	\$20.50
11/23/2018	Review comm from C. Kresslein to J. Liew attaching docs.	H.B.H.	.10	\$40.00
11/26/2018	Review disc. prod. from def, review and respond to email from op con re. missing files.	J.L.	.50	\$102.50
11/26/2018	Update client contact list.	J.L.	.10	\$20.50
11/26/2018	Draft email to Pls. to sched. phone interview re hours.	J.L.	.30	\$61.50
11/26/2018	Review and reply to email from Pl. Banks re phone interview.	J.L.	.10	\$20.50
11/26/2018	Scan opt-in for Swisher, email op con for consent to late file, create Pl. file.	J.L.	.30	\$61.50
11/26/2018	Perform damage calcs for Pl. Banks based on wage and hour docs from Def.	J.L.	2.70	\$553.50
11/26/2018	Review email from JSL to clients regarding scheduling interviews for demand letter.	G.H.	.10	\$20.50
11/26/2018	Review email from JSL to opposing counsel regarding missing documents from production.	G.H.	.10	\$20.50
11/27/2018	Review email from opposing counsel regarding	G.H.	.10	\$20.50

	production of wage and hour documents.			
11/27/2018	Update questionnaire for case.	J.L.	.30	\$61.50
11/27/2018	Phone interview w/ Pl. Banks re wage and hour docs and details of employment.	J.L.	.90	\$184.50
11/27/2018	Review of disc. prod. w/ HBH and discussion of what is needed.	J.L.	.30	\$61.50
11/27/2018	Draft email to op con re disc. production needs for additional docs.	J.L.	.20	\$41.00
11/27/2018	Calculate damages for Pls.	J.L.	3.10	\$635.50
11/28/2018	Review email from opposing counsel regarding late opt-in plaintiff.	G.H.	.10	\$20.50
11/29/2018	Review of disc prod., damage calcs for Pls. Banks and Carney	J.L.	8.10	\$1,660.50
11/30/2018	Review disc. prod. damage calcs.	J.L.	1.10	\$225.50
12/3/2018	Damage calcs for Pls.	J.L.	3.10	\$635.50
12/6/2018	Draft email to op con re consent on late opt-in, review answer.	J.L.	.10	\$20.50
12/6/2018	Review email exchange between JSL and opposing counsel regarding late opt-in.	G.H.	.10	\$20.50
12/6/2018	Review comms between J. Liew and C. Kresslein.	H.B.H.	.20	\$80.00
12/7/2018	Phone calls/draft emails to Pls. to schedule phone interviews,	J.L.	.30	\$61.50
12/7/2018	Review email from JSL to client A. Carney regarding scheduling interview.	G.H.	.10	\$20.50
12/7/2018	Phone call w/ Pl. Arthur re employment details.	J.L.	.60	\$123.00
12/10/2018	Phone call w/ Gavin Arthur re case details and damage calcs.	J.L.	.10	\$20.50
12/10/2018	Review paper damage calcs from Pl. Carney.	J.L.	.10	\$20.50
12/11/2018	Attempt to call Pl. Carney and Arthur.	J.L.	.10	\$20.50
12/11/2018	Review Pl. Carney's own time hour estimates and compare to time clock audit hours.	J.L.	.20	\$41.00
12/11/2018	Attempt to call Pls. to schedule phone interviews.	J.L.	.10	\$20.50
12/11/2018	Attempt to call, draft email to pot. Pl. Swisher.	J.L.	.10	\$20.50
12/11/2018	Create summary tables for damage calcs, draft email to HBH with damage calcs.	J.L.	.20	\$41.00
12/11/2018	Phone call w/ Pl. Carney re details of employment, review of wage docs.	J.L.	1.40	\$287.00
12/12/2018	Review email exchange between HBH and opposing counsel regarding scheduling a teleconference to discuss necessary production.	G.H.	.10	\$20.50
12/12/2018	Brief phone confer w/ HBH and op con re disc. needs.	J.L.	.10	\$20.50
12/12/2018	Phone call w/ Pl. Arthur re wage record details.	J.L.	.30	\$61.50
12/14/2018	Review disc prod. of pay records.	J.L.	1.90	\$389.50
12/17/2018	Draft email to pot. Pl. re damage calcs for demand on Def's request.	J.L.	.20	\$41.00
12/17/2018	Phone convo w/ Pl Carney re update on getting bank records.	J.L.	.10	\$20.50
12/20/2018	Review pay spreadsheets, update damage calcs for Pl. Carney, enter hour records for pot. Pl. Swisher.	J.L.	6.40	\$1,312.00
12/21/2018	Phone interview w/ pot. opt-in Swisher re employ.	J.L.	.50	\$102.50

	details.			
12/21/2018	Draft email to pot. opt in Swisher w/ hour wage docs.	J.L.	.10	\$20.50
12/24/2018	Damage calcs, identify missing disc. production docs.	J.L.	5.00	\$1,025.00
12/27/2018	Update and conduct damage calculations with pay records.	J.L.	5.40	No Charge
12/28/2018	Damage calcs, integration of pay records into calcs, finalize and format spreadsheet.	J.L.	3.50	\$717.50
12/28/2018	Draft email to Pl. Riffey re phone interview scheduling.	J.L.	.10	\$20.50
12/31/2018	Draft email to Pl. Brook re wage and hour docs for phone interview.	J.L.	.10	\$20.50
1/2/2019	Phone interview w/ Pl. Brook re employment details and review of time audit records.	J.L.	1.00	\$205.00
1/2/2019	Updating damage calcs with estimates from Pl. Brook, correct errors in calculations.	J.L.	.80	\$164.00
1/2/2019	Draft demand letter to op con.	J.L.	1.00	\$205.00
1/4/2019	Phone call w/ Pl. Carney re annotated wage and hour docs emailed to us for review.	J.L.	.20	\$41.00
1/4/2019	Briefly review comm from A. Carney.	H.B.H.	.10	\$40.00
1/7/2019	Phone call w/ Pl. Riffey re scheduling phone interview and transmission of wage docs.	J.L.	.20	\$41.00
1/7/2019	Integrating Pl. Carney's estimations into damage calcs.	J.L.	.30	\$61.50
1/8/2019	Phone interview w/ Pl. Riffey re details of employment and review of wage docs.	J.L.	.60	\$123.00
1/8/2019	Integrate estimated amounts for Pl. Carney into damage calcs.	J.L.	6.00	\$1,230.00
1/9/2019	Integrate estimates from Pl. Riffey into damage calcs, finalize damage calcs (1.2); edit and review demand letter (0.2).	J.L.	1.40	\$287.00
1/10/2019	Tele conf with C. Swisher re calculation issues.	H.B.H.	.10	\$40.00
1/10/2019	Phone call w/ Pl. Riffey re question about time records.	J.L.	.10	\$20.50
1/15/2019	Review Pl. Swisher's docs, update damage calc spreadsheet.	J.L.	5.30	\$1,086.50
1/18/2019	Update damage calcs with estimates from Pl. Swisher (4.2); Edit and update demand ltr. to op con (0.2).	J.L.	4.40	\$902.00
1/23/2019	Calculate and draft prop. sched. order.	J.L.	.40	\$82.00
1/24/2019	Edit and update damage calcs (0.8); update demand ltr. accordingly (0.1).	J.L.	.90	\$184.50
1/24/2019	Sort and prepare pre-bill.	J.L.	.10	\$20.50
1/31/2019	Review joint status report by Defs.	J.L.	.10	\$20.50
1/31/2019	Draft comm to opposing counsel re status of settlement offer and requested status report.	H.B.H.	.10	\$40.00
2/1/2019	Phone call w/ opposing counsel re questions about damage calculations.	J.L.	.30	\$61.50
2/1/2019	Review Status Report; multi comm with counsel re same.	H.B.H.	.30	\$120.00

2/1/2019	Review Order granting status report.	H.B.H.	.10	\$40.00
2/4/2019	Review email from opposing counsel to HBH re. facts supporting time shaving claim.	J.L.	.10	\$20.50
2/15/2019	Review and respond to comm. from opposing counsel.	H.B.H.	.10	\$40.00
2/21/2019	Phone conference w/ Opposing Counsel and HBH re. counter-demand and issues with calculations.	J.L.	.30	\$61.50
2/21/2019	Tele conf with opposing counsel re settlement (.3 hrs); review lengthy comm from opposing counsel re same. (.1 hrs)	H.B.H.	.40	\$160.00
2/21/2019	Draft comm to J. Liew re instructions re calculations.	H.B.H.	.10	\$40.00
2/22/2019	Review detailed counter-offer email from opposing counsel, review provided documents and check against our calculations.	J.L.	.30	\$61.50
2/25/2019	Modify equations spreadsheet for further calculations for settlement purposes (0.7); draft email to Pl. Riffey re. confirmation of non-payment (0.2); draft email to Pl. Arthur re. settlement offer (0.2); draft mass text to Pls. to call office re. settlement offer (0.2); phone call w/ Pl. Brook re. settlement offer (0.2); phone call w/ Pl. Banks re. settlement offer (0.2).	J.L.	1.70	\$348.50
2/25/2019	Phone call w/ Pl. Carney re. settlement offer.	J.L.	.40	\$82.00
2/26/2019	Phone call w/ Pl. Swisher re. settlement counter-offer.	J.L.	.10	\$20.50
2/26/2019	Calculate additional possible settlement values, draft settlement counter-offer letter.	J.L.	1.80	\$369.00
2/26/2019	Review counter-offer settlement letter to opposing counsel from HBH.	J.L.	.10	\$20.50
2/26/2019	Draft letter to opposing counsel re settlement terms; review and revise. Draft comm to opposing counsel attaching same.	H.B.H.	1.30	\$520.00
2/27/2019	Reply to email from Pl. Banks re. various questions about lawsuit.	J.L.	.40	\$82.00
2/27/2019	Review comm from J. Liew to K. Banks. Draft comm to K. Banks.	H.B.H.	.10	\$40.00
3/1/2019	Phone confer w/ HBH and opposing counsel re. settlement issues. (.2 hrs). Confer with HBH following call re status of negotiation. (.1 hrs)	J.L.	.30	\$61.50
3/1/2019	Draft comm to CK re status of matter, review response. (.1 hrs). Tele conf. with counsel re status of settlement and related negotiations. (.2 hrs). Confer with J. Liew re same. (.1 hrs).	H.B.H.	.40	\$160.00
3/1/2019	Review comm from C. Kresslein re settlement terms.	H.B.H.	.10	\$40.00
3/4/2019	Review draft joint status report from Defs.	J.L.	.10	\$20.50
3/7/2019	Review comm from Chambers re status of matter.	H.B.H.	.10	\$40.00
3/11/2019	Calculate new damage values, confer w/ HBH re. new numbers.	J.L.	.20	\$41.00
3/11/2019	Confer and calculate new settlement numbers for	J.L.	.40	\$82.00

	Pls.			
3/11/2019	Draft email to Pl. Riffe re. urgent response required to settlement negotiations issues.	J.L.	.20	\$41.00
3/11/2019	Review calculations, and draft settlement comm (offer) to counsel. (.2 hrs). Confer with opposing counsel re same. (.1 hrs).	H.B.H.	.30	\$120.00
3/12/2019	Review email from Pl. Riffe, draft and send response.	J.L.	.20	\$41.00
3/12/2019	Draft comm re counter-response re settlement to opposing counsel.	H.B.H.	.20	\$80.00
3/14/2019	Draft comm to counsel; review response re settlement.	H.B.H.	.10	\$40.00
3/14/2019	Review billing statement for discounts and reductions w/ HBH (0.3); adjust billing statement for discount rates (0.4).	J.L.	.70	\$143.50
3/14/2019	Review settlement status and offer re fees; draft very lengthy response.	H.B.H.	.50	\$200.00
3/15/2019	Review comm from opposing counsel re status of settlement negotiations.	H.B.H.	.10	No Charge
3/18/2019	Draft email to opposing counsel re. status of their position on settlement offer.	J.L.	.10	\$20.50
3/20/2019	Phone call w/ Pl. Carney re. status of case and settlement.	J.L.	.20	\$41.00
3/20/2019	Draft settlement agreement.	J.L.	4.30	\$881.50
3/20/2019	Edit settlement agreement (0.4); Review and edit joint motion for approval of settlement agreement (0.7).	J.L.	1.10	\$225.50
3/20/2019	Draft joint motion for approval of settlement agreement.	J.L.	3.20	\$656.00
4/1/2019	Draft email to Pls. re status of settlement.	J.L.	.20	\$41.00
4/1/2019	Review email from Pl. Banks.	J.L.	.10	\$20.50
4/4/2019	Review joint motion for settlement approval and email to opposing counsel from HBH containing same.	J.L.	.10	\$20.50
4/4/2019	Review and revise Joint Motion and proposed Order; draft comm to opposing counsel re same.	H.B.H.	.80	\$320.00
4/12/2019	Brief review of opposing counsel's edit to settlement agreement and joint motion.	J.L.	.10	\$20.50
4/18/2019	Email to opposing counsel re. payment method to Pl. Riffe, scheduling phone call do discuss edits to settlement agreement.	J.L.	.10	\$20.50
4/18/2019	Confer w/ HBH re. Defendants' edits to settlement agreement and tax issues raised by attempting to tax clients for attorneys' fees and costs.	J.L.	.20	\$41.00
4/18/2019	Confer with D. English re status of wire transfer issue.	H.B.H.	.10	\$40.00
4/19/2019	Tele conf with CK re settlement agreement and tax issues. Confer with JL re same.	H.B.H.	.20	\$80.00
4/22/2019	Review email from opposing counsel re. tax issues, review memo from opposing counsel, review IRS opinions.	J.L.	.30	\$61.50

4/22/2019	Draft in-depth letter to opposing counsel re. tax issues.	J.L.	4.20	\$861.00
4/22/2019	Multi comm with opposing counsel re tax issue; review 2 pg memo from Jackson Lewis.	H.B.H.	1.50	\$600.00
4/23/2019	Review case and article re. tax issues applicable to tax issues raised by opposing counsel.	J.L.	.30	\$61.50
4/23/2019	Review and edit letter to opposing counsel. re tax issues.	J.L.	.40	\$82.00
4/23/2019	Legal research re issuance of 1099 to each opt-in for proportional amounts of atty fees; review and revise six page letter to Kresslein re tax issues. (5.3 hrs). Draft comm to Kresslein attaching same.	H.B.H.	5.70	\$2,280.00
4/23/2019	Draft comm to K. Foster re status of matter.	H.B.H.	.10	\$40.00
4/24/2019	Review email communications from opposing counsel re. tax issue and other settlement agreement edits.	J.L.	.10	\$20.50
4/24/2019	Conference w/ HBH and SEK on case status and assignment of duties.	J.L.	.10	\$20.50
4/25/2019	Review emails re: Join Motion for Approval	S.K.	.20	No Charge
4/25/2019	Review and accept/reject edits to settlement agreement and Joint Motion; draft comm to opposing counsel re same.	H.B.H.	.50	\$200.00
4/26/2019	Review email communications between HBH and opposing counsel re. edits to settlement agreement and proposed order.	J.L.	.10	\$20.50
4/26/2019	Phone call w/ HBH re. status of set. agreement.	J.L.	.10	\$20.50
4/26/2019	Edit and finalize settlement agreement, proposed order and joint motion.	J.L.	1.10	\$225.50
4/26/2019	Review Joint Motion for Approval	S.K.	.10	No Charge
4/26/2019	Confer with J. Liew re status of matter, signature of agreement by clients, and transmittal of clean copies to Defendants. Review comm from J. Liew to opposing counsel re same.	H.B.H.	.20	\$80.00
4/29/2019	Review email from opposing counsel, make minor edits to settlement agreement.	J.L.	.10	\$20.50
5/2/2019	Review email from HBH to opposing counsel re. final edits to settlement agreement.	J.L.	.10	\$20.50
5/2/2019	Review settlement agreement; finalize same. Draft comm. to opposing counsel re same.	H.B.H.	.50	\$200.00
5/4/2019	Draft comm to clients re settlement; transmit settlement agreements and tax docs to clients via email and docuSign.	H.B.H.	.80	\$320.00
5/6/2019	Call Pls. re. deficient tax forms and signing of settlement agreement, re-send tax forms via DocuSign for correction.	J.L.	.40	\$82.00
5/7/2019	Prepare and collect signatures pages. Prepare and collect tax documents. Transmit same to opposing counsel. Tele conf with opposing counsel re same (and status of matter).	H.B.H.	.50	\$200.00
5/8/2019	Review emails between HBH and opposing counsel re. logistics of transferring money to Pl. Riffey and	J.L.	.10	\$20.50

	signing of set. agreement.			
5/9/2019	Review emails between HBH and opposing counsel re. exchange of tax documents and signatures for settlement agreement.	J.L.	.10	\$20.50
5/9/2019	Draft email to Court re. status of settlement agreement.	J.L.	.10	\$20.50
5/9/2019	Comm with ZB re tax documents. Comm with opposing counsel re status of matter. Confer with assoc atty re status of matter.	H.B.H.	.20	\$80.00
5/10/2019	Draft affidavit for joint motion and settlement agreement (0.1); prepare and finalize settlement documents for filing (0.7).	J.L.	.80	\$164.00
5/10/2019	Draft fee affidavit; confer with assoc atty (J Liew re Motion for Approval). Prepare billing record materials.	H.B.H.	.80	\$320.00
SUBTOTAL:			195.70	\$47,860.50

Costs

3/26/2018	Filing Fee		\$400.00
5/10/2018	Process Service (Beach Process Service)		\$240.00
9/7/2018	Postage - Class Mailing		\$213.00
5/10/2019	Copy Charges (2,077 @ .25/copy)		\$519.25
SUBTOTAL:			\$1,372.25

Matter Ledgers

SUBTOTAL:

Trust Account

5/10/2019	Previous Balance	\$0.00
Available in Trust:		\$0.00

TOTAL \$49,232.75
 PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$49,232.75